

**UNITED STATES OF AMERICA  
FEDERAL ENERGY REGULATORY COMMISSION**

**BROADWATER ENERGY, LLC  
BROADWATER PIPELINE LLC  
BROADWATER PIPELINE LLC**

**Docket Nos. CP06-54-000  
CP06-55-000  
CP06-56-000**

**MOTION TO INTERVENE  
OF THE TOWN OF HUNTINGTON, NEW YORK**

Pursuant to Rule 214 of the Federal Energy Regulatory Commission's Rules of Practice and Procedure, 18 C.F.R. §385.214, the Town of Huntington, Long Island, New York (referred to herein as "Huntington" or the "Town") by its attorneys, Jaspan Schlesinger Hoffman LLP, hereby petitions the Federal Energy Regulatory Commission ("FERC") for an order granting Huntington party status in the above-referenced proceedings. The Town of Huntington further seeks a formal evidentiary hearing on the referenced applications pursuant to 18 C.F.R. §157.10(a)(1).

The persons to whom communications regarding this motion should be addressed and upon whom service of all pleadings or other documents in these proceedings should be made are:

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Huntington respectfully submits the following as its grounds for intervention as a party:

1. Petitioner, Huntington, is a municipal corporation duly established under the laws of the State of New York.
2. Huntington is the westernmost town in the County of Suffolk, New York on the Long Island's north shore adjoining Long Island Sound.
3. Huntington encompasses coastline on Long Island Sound as well as the waters and underwater lands in Huntington Bay, Lloyd Harbor, Huntington Harbor, Centerport Harbor and Northport Harbor, all of which are part of the greater Long Island Sound estuary.
4. Huntington's jurisdictional limits therefore include both on-shore and off-shore areas affected by the proposed Broadwater Project, which includes the siting, construction and operation of an offshore liquefied natural gas receiving terminal and associated facilities, collectively the Floating Storage and Regasification Unit ("FSRU"), in Long Island Sound and a 22 mile subsea lateral pipeline and related facilities to transport natural gas from the FSRU to an interconnection with the existing Iroquois Gas Transmission System subsea pipeline.

5. The Iroquois Gas Transmission pipeline runs from Connecticut to Long Island, New York, under Long Island Sound and makes landfall at the Keyspan Power Station in Northport in the Town of Huntington. From that point the pipeline branches into an underground line which heads south through the Town, and another subsea branch back under Long Island Sound, called the Eastchester Extension, which goes from Northport to the Bronx, New York.

6. As the Iroquois Gas Transmission System transits through the entire length of the Town, Huntington will be the recipient of the natural gas from the FSRU to Long Island. Iroquois also has an additional application before FERC (Docket No. PF05-16) to extend the Iroquois pipeline from its present terminus in South Commack, New York, 21.6 miles to South Yaphank, New York.

7. Huntington has already noted in response to the pre-application filing of the Broadwater Project with FERC its concern that the Broadwater Project would have a negative effect on the environmental stability and economic viability of Long Island Sound, thereby impacting all residents and visitors to Huntington that avail themselves of the Sound's resources for recreational and commercial use.

8. The Town is particularly concerned for the protection of coastal resources of high environmental and recreational value in the Town on Long Island Sound, such as Crab Meadow and Soundview Beaches and the Jerome Ambro Preserve.

9. The safety, health, general welfare and security of its residents are of paramount interest to Huntington. The proposed Broadwater Project including the FSRU, subsea lateral and its gas flowing through the Town, will have environmental, recreational, health, economic, safety and security impacts on the Town and its residents.

10. Human, animal, avian and marine life will be impacted by the construction and operation of the proposed Broadwater Project. The waters and lands under the jurisdiction of the Town and other economic, cultural and natural resources of the Town will be impacted by the proposed Broadwater Project. All of these resources are held in public trust for the citizens of the Town.

11. The proposed Broadwater Project raises significant legal issues that will impact Huntington. Huntington is responsible for protecting the legal rights of the Town and its residents.

12. The public interest mandates that Huntington be granted an order to intervene as a party in these proceedings, as the proposed Broadwater Project will have significant short term and long term impacts upon the Town, its residents, its upland, coastal and underwater lands and its waters.

13. No disruption of the proceedings will result from Huntington being granted party status.

14. Huntington's interests will not be adequately represented by any other party to these proceedings.

15. Huntington's intervention as a party at this point in time will not prejudice any party to these proceedings.

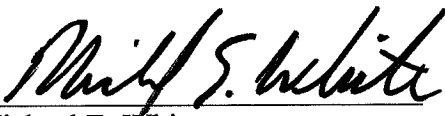
WHEREFORE, the Town of Huntington requests that FERC grant its motion to intervene as a party in these proceedings with all rights to participate in these proceedings and specifically requests that FERC hold formal evidentiary hearings on these applications.

Dated: March 10, 2006  
Garden City, New York

Respectfully submitted,

Jaspan Schlesinger Hoffman LLP

By:

  
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**Certificate of Service**


I certify that I have served this day via Federal Express, overnight delivery service, the foregoing document upon the following in the absence of a service list yet provided to these dockets:

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Dated: Garden City, NY  
March 10, 2006

  
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